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	UNITED STATES DISTRICT COURT
10	NORTHERN DISTRICT OF CALIFORNIA
1	SAN FRANCISCO DIVISION
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4	UNITED STATES OF AMERICA,) NO. CR 3:20-CR-00257-WHO
15	Plaintiff,) MOTION TO UNSEAL
6	v.)
17	WING LOK WONG,
8	Defendant.
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20	On July 6, 2020, defendant Wong pled guilty before this Court to a two-count Information. <i>Dkt</i>
21	11. At the request of the government, Exhibit A of the Plea Agreement, containing the factual basis for
22	the plea, was filed under seal because the government's investigation of the facts underlying defendant
23	WONG's conduct and potential criminal conduct by other individuals was ongoing. Except for
24	relatively minor redactions related to an ongoing investigation, there is no longer an investigative need
25	by the government to keep defendant WONG's entire factual admissions in Exhibit A under seal. The
26	undersigned Assistant U.S. Attorney consulted with counsel for defendant WONG, who has no
27	objection to unsealing Exhibit A with limited redactions.
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	MOTION TO UNSEAL/PROPOSED ORDER 1 CR 3:20-cr-00257-WHO

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1	Therefore, the government respectfully requests that this Court order that Exhibit A to defendant
2	WONG's plea agreement be unsealed with limited redactions. To effectuate this unsealing with limited
3	redactions, the government attaches hereto as Exhibit 1 to the instant Motion to Unseal a partially
4	redacted version of Exhibit A to the Plea Agreement under seal.
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7	STEPHANIE M. HINDS
8	United States Attorney
9	
10	Dated: March 16, 2023 /s/ Christiaan Highsmith CHRISTIAAN H. HIGHSMITH
11	Assistant United States Attorney
12	For good cause shown, it is SO ORDERED that Exhibit 1 to the government's Motion to Unseal is
13	hereby unsealed.
14	W. MOO
15	Dated: March 17, 2023 HONORABLE WILLIAM H. ORRICK
16	United States District Court Judge
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